



April 10, 2006

Docket Management Facility  
U.S. Department of Transportation  
Nassif Building—Room PL-401  
400 7th Street, SW  
Washington, DC 20590

Re: Procedures for Transportation Workplace Drug and Alcohol Testing  
programs: Revision of Substance Abuse Professional Credential  
Requirement; Docket No. OST-2006-24112

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The Air Transport Association of America, Inc. (ATA),<sup>1</sup> the Regional Airline Association (RAA),<sup>2</sup> the National Air Carrier Association (NACA),<sup>3</sup> and the Air Carrier Association of America (ACAA)<sup>4</sup> appreciate this opportunity to provide, on behalf of our member airlines, the following comments on the FAA's Notice of Proposed Rulemaking (NPRM) concerning credentials for Substance Abuse Professionals (SAPs). 71 Fed. Reg. 12,331 (proposed Mar. 10, 2006). ATA is the principal trade and service association of the U.S. scheduled airline industry. ATA's members account for more than ninety-five percent of all passenger traffic carried annually by U.S. scheduled airlines. RAA is the trade and service association for regional airlines. RAA's member airlines transported ninety-seven percent of regional airline passengers in 2005. NACA is the trade association representing the aviation industry's primary charter operators. ACAA represents low-fare airlines. The Department's proposal, therefore, would have a direct impact on ATA's, RAA's, NACA's, and ACAA's members.

ATA, RAA, NACA, and ACAA agree that the evaluation, referral, and treatment information provided by an SAP is critical for airlines in determining if an employee who has violated the

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<sup>1</sup> ATA's members are: ABX Air, Inc.; Alaska Airlines; Aloha Airlines; American Airlines; ASTAR Air Cargo; ATA Airlines; Atlas Air; Continental Airlines; Delta Air Lines; Evergreen International Airlines; FedEx Corp.; Hawaiian Airlines; JetBlue Airways; Midwest Airlines; Northwest Airlines; Southwest Airlines; United Airlines; UPS Airlines; and US Airways. Associate members are: Aeromexico; Air Canada; Air Jamaica; and Mexicana.

<sup>2</sup> RAA's members are Air Canada Jazz, Air Serv International, Air Wisconsin Airlines Corporation, AirNet Systems, American Eagle Airlines, Atlantic Southeast Airlines, Big Sky Airlines, Cape Air, Caribbean Sun Airlines, Chautauqua Airlines, Colgan Air, Comair, CommutAir, Empire Airlines, Era Aviation, ExpressJet, FedEx, Flight Options, GoJet, Grand Canyon Airlines, Great Lakes Aviation, Gulfstream International Airlines, Horizon Air, IBC Airways, Island Air, Mesa Airlines, Mesaba Aviation, New England Airlines, Pace Airlines, Pinnacle Airlines, PSA Airlines, Piedmont Airlines, Regions Air, Republic Airlines, Salmon Air, Scenic Airlines, Shuttle America, Sky West Airlines, Skyway Airlines and Trans States Airlines.

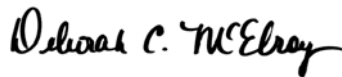
<sup>3</sup> NACA's members include: Air Transport International, Allegiant Airlines, ATA Airlines, Centurion Air Cargo, Champion Air, Express.Net Airlines, Falcon Air Express, Gemini Air Cargo, Miami Air International, North American Airlines, Omni Air International, Pace Airlines, Ryan International Airlines, Southern Air, USA3000 Airlines, and World Airways.

<sup>4</sup> ACAA's members include AirTran Airways, Frontier Airlines, Spirit Airlines, and MN Airlines d/b/a Sun Country Airlines.

regulations is eligible to perform safety-sensitive duties again. Additionally the SAP's recommendations for follow-up testing play an important role in ensuring that the employee can continue his or her rehabilitation. For these reasons, it is important that SAPs be licensed and/or certified in their respective states.

Major and regional airlines serve 674 communities in the United States.<sup>5</sup> In some small cities, airlines have experienced difficulties in locating qualified SAPs. We believe that the proposal to add state licensed or certified marriage and family therapists to the list of credentialed professions eligible to serve as SAPs under subpart O of 49 CFR part 40 will assist airlines in identifying SAPs in smaller, more rural locations.

Respectfully submitted,




Deborah C. McElroy  
President  
Regional Airline Association  
2025 M Street, N.W.  
Suite 800  
Washington, D.C. 20036-3309  
T: 202-367-1170  
F: 202-367-2170  
E: [mcelroy@raa.org](mailto:mcelroy@raa.org)



Sophy Chen  
Senior Attorney  
Air Transport Association of America, Inc.  
1301 Pennsylvania Avenue, NW  
Suite 1100  
Washington, DC 20004-1707  
T: 202-626-4177  
F: 202-626-7292  
E: [schen@airlines.org](mailto:schen@airlines.org)



Ronald N. Priddy  
President  
National Air Carrier Association  
1000 Wilson Boulevard  
Suite 1700  
Arlington, VA 22209  
T: 703-358-8061  
F: 703-358-8070  
E: [rpriddy@naca.cc](mailto:rpriddy@naca.cc)



Edward P. Faberman  
Executive Director  
Air Carrier Association of America  
1776 K Street, NW  
9<sup>th</sup> Floor  
Washington, DC 20006  
T: 202-719-7420  
F: 202-719-7049  
E: [efaberman@acaal.com](mailto:efaberman@acaal.com)

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<sup>5</sup> Data as of January 2006 from Back Aviation Solutions.